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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re FACEBOOK BIOMETRIC  
INFORMATION PRIVACY LITIGATION

) Master File No. 3:15-cv-03747-JD

) CLASS ACTION

) This Document Relates To:

) ALL ACTIONS.

) DECLARATION OF SHAWN A.  
) WILLIAMS IN SUPPORT OF PLAINTIFFS'  
) MOTION TO EXCLUDE THE TESTIMONY  
) OF DEFENDANTS' PROPOSED EXPERT  
) MATTHEW TURK, PH.D.

[REDACTED]

I, Shawn A. Williams, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the State of California and before this District Court. I am a member of the law firm Robbins Geller Rudman & Dowd LLP, counsel of record for plaintiffs in the above-entitled action. I make this Declaration in Support of Plaintiffs' Motion to Exclude the Testimony of Defendant's Proposed Expert Matthew Turk, Ph.D. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify hereto.

2. Attached are true and correct copies of the following exhibits:

Exhibit 1: [REDACTED] [FILED UNDER SEAL];

Exhibit 2: [REDACTED] [FILED UNDER SEAL];

Exhibit 3: [REDACTED] [FILED UNDER SEAL];

Exhibit 4: [REDACTED] [FILED UNDER SEAL];

Exhibit 5: "DeepFace: Closing the Gap to Human-Level Performance in Face Verification" by Yaniv Taigman *et al.* (Bates No. FBBIPA\_00001214-FBBIPA\_00001221);

Exhibit 6: "Submission by 'Facebook Ireland Ltd'" to the Office of the Irish Data Protection Commissioner: Response to Complaint(s) Number: 9," received September 30, 2013;

Exhibit 7: [REDACTED] [FILED UNDER SEAL];

Exhibit 8: [REDACTED] [FILED UNDER SEAL];

Exhibit 9: [REDACTED] [FILED UNDER SEAL];

Exhibit 10: "Facebook turns off automatic facial recognition feature for all European users in victory for privacy campaigners," DailyMail.com, dated October 16, 2012; and

Exhibit 11: [REDACTED] [FILED UNDER SEAL].

1 I declare under penalty of perjury under the laws of the State of California that the foregoing  
2 is true and correct. Executed this 16th day of March, 2018, at San Francisco, California.

3  
4 s/ Shawn A. Williams  
SHAWN A. WILLIAMS